



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

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OFFICE OF
ECOSYSTEMS,
TRIBAL AND PUBLIC
AFFAIRS

June 24, 2013

Peter Wikoff, Natural Resource Planner
U.S. Fish and Wildlife Service
1101 East Tudor Road, MS-231
Anchorage, Alaska 99503

Re: EPA comments on the USFWS Shadura Natural Gas Development Project Final Environmental Impact Statement, EPA Project #12-0024-FWS.

Dear Mr. Wikoff:

We have reviewed the Final Environmental Impact Statement for the Shadura Natural Gas Development project in the Kenai National Wildlife Refuge, Alaska (CEQ #20130132) in accordance with our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act.

Overall we commend the US Fish and Wildlife Service for a comprehensive document that is responsive to the comments submitted in scoping and during the Draft EIS. We believe that the mitigation identified in the document, along with any additional mitigation required by the US Army Corps of Engineers for the Clean Water Act Section 404 permit, will adequately avoid and minimize the potential impacts to air quality, recreation, water resources, and habitat associated with project. We also believe the analysis conducted under the Interagency Air Quality Memorandum of Understanding was appropriate and added to the high quality of the document.

We are disappointed, however, that our recommendation to include a draft 404(b)(1) analysis in the Final EIS was not pursued. Such an analysis would have been helpful to the Corps in their upcoming decision for the Section 404 permit. It is also useful to ensure that the range of reasonable alternatives contains an alternative that includes the least environmentally practicable alternative, which is the only alternative that can be permitted by the Corps. We recommend that any future projects include such an analysis if appropriate and practical. We do recognize that the Service included Appendix A Upland and Wetland Functions and Values Forms in the Final EIS, which should be quite informative for the Corps' decision.

Thank you for the opportunity to offer additional comments on this Final EIS. Please contact me at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov, or you may contact Jennifer Curtis of my staff in Anchorage at (907) 271-6324 or by electronic mail at curtis.jennifer@epa.gov, with any questions you have regarding our comments.

Sincerely,

A handwritten signature in blue ink, which appears to read "Christine Reichgott", followed by a small "for" in blue ink.

Christine B. Reichgott, Manager
Environmental Review and Sediments Management Unit